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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
acc

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2014 Grand Jury

'15CR2932 GPC

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAVID STROJ (1),
aka "Fat Dave,"
MATTHEW GREENWOOD (2),
JEFFREY BROADT (3),
JEFFREY STOFF (4),
ARTURO DIAZ-RAMIREZ (5),
JAIME BEHAR (6),
ROBERT STROJ (7),
CRAIG KOLK (8),
JEAN PAUL ROJO (9),
JOSHUA JONES (10),
RICARDO
CASTELLANOS-VELASQUEZ (11),
ALEXANDRA KANE (12),
BRYAN SIBBACH (13),
JOSEPH PALERMO (14),
THOMAS MALLOZZI (15),
aka "Tommy Ty,"
STEPHEN BEDNAR (16),
aka "Stevie T,"
CHRISTOPHER PARSONS (17),
JEFFREY MOHR (18),
KYLE ALLEN (19),
MICHAEL HIPPLE (20),
DUY TRANG (21),
ALFREDO BARBA (22),
ALI LAREYBI (23),
aka "Alex,"

Case No.

I N D I C T M E N T

Title 18, U.S.C., Sec. 1955 -
Illegal Gambling Business;
Title 18, U.S.C., Sec. 1956(h) -
Conspiracy to Launder Monetary
Instruments; Title 31, U.S.C.,
Secs. 5318(h)(1) and 5322(a),
and Title 31, C.F.R.,
Sec. 1021.210(a) - Failure to
Maintain Anti-Money Laundering
Program; Title 18, U.S.C.,
Sec. 2421 - Transportation for
Prostitution; Title 18, U.S.C.,
Sec. 2 - Aiding and Abetting;
Title 18, U.S.C.,
Secs. 981(a)(1)(A), 981(a)(1)(C),
982(a)(1), 1955(d), 2428(b), and
Title 28, U.S.C., Sec. 2461(c) -
Criminal Forfeiture

1 NASEEM SALEM (24),
2 aka "Nick,"
3 PALOMAR CARD CLUB (25),
4 HARVEY SOUZA (26),
5 VC CARDROOM, Inc. (27),
6 dba "Seven Mile Casino,"
7 fka "Village Card Club,"
8
9 Defendants.

10 The grand jury charges:

11 Count 1

12 (Illegal Bookmaking Business)

13 From at least in or about 2013, up to and including, in or about
14 November 18, 2015, within the Southern District of California and
15 elsewhere, defendants DAVID STROJ, aka "Fat Dave," MATTHEW GREENWOOD,
16 JEFFREY BROADT, JEFFREY STOFF, ARTURO DIAZ-RAMIREZ, JAIME BEHAR,
17 ROBERT STROJ, CRAIG KOLK, JEAN PAUL ROJO, JOSHUA JONES, RICARDO
18 CASTELLANOS-VELASQUEZ, ALEXANDRA KANE, BRYAN SIBBACH, JOSEPH PALERMO,
19 THOMAS MALLOZZI, aka "Tommy Ty," STEPHEN BEDNAR, aka "Stevie T,"
20 CHRISTOPHER PARSONS, JEFFREY MOHR, KYLE ALLEN, and MICHAEL HIPPLE,
21 knowingly and willfully, did conduct, finance, manage, supervise,
22 direct and own all or part of an illegal gambling business, as that
23 term is defined in Title 18, United States Code, Section 1955(b)(1),
24 (2), and (3), to wit a bookmaking business that violated California
25 Penal Code, Section 337(a), which involved five or more persons who
26 conducted, financed, managed, supervised, directed and owned all or
27 part of said illegal gambling business, and which remained in
28 substantially continuous operation for a period in excess of thirty
days and had a gross revenue of \$2,000.00 in any single day; in
violation of Title 18, United States Code, Sections 1955 and 2.

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Count 2

(Illegal Poker and Blackjack Business)

From at least in or about 2013, up to and including, in or about November 18, 2015, within the Southern District of California and elsewhere, defendants DAVID STROJ, aka "Fat Dave," JEFFREY STOFF, ARTURO DIAZ-RAMIREZ, JAIME BEHAR, DUY TRANG, and ALFREDO BARBA, knowingly and willfully, did conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, as that term is defined in Title 18, United States Code, Section 1955(b)(1), (2), and (3), to wit, an illegal poker and blackjack business that violated California Penal Code, Sections 330 and 337j, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of said illegal gambling business, and which remained in substantially continuous operation for a period in excess of thirty days and had a gross revenue of \$2,000.00 in any single day; in violation of Title 18, United States Code, Sections 1955 and 2.

Count 3

(Money Laundering Conspiracy)

From at least in or about 2013, up to and including, in or about October 15, 2015, within the Southern District of California and elsewhere, defendants DAVID STROJ, aka "Fat Dave," MATTHEW GREENWOOD, JEFFREY BROADT, JEFFREY STOFF, ARTURO DIAZ-RAMIREZ, JAIME BEHAR, ROBERT STROJ, CRAIG KOLK, JEAN PAUL ROJO, RICARDO CASTELLANOS-VELASQUEZ, ALEXANDRA KANE, BRYAN SIBBACH, JOSEPH PALERMO, CHRISTOPHER PARSONS, JEFFREY MOHR, DUY TRANG, ALI LAREYBI, aka "Alex," NASEEM SALEM, aka "Nick," and PALOMAR CARD CLUB, did knowingly and intentionally conspire with each other and with others known and

1 unknown to the grand jury, to conduct financial transactions affecting
2 interstate and foreign commerce which involved the proceeds of
3 specified unlawful activity, that is, an illegal bookmaking business
4 and an illegal poker and blackjack business, knowing that the property
5 involved in the financial transactions represented the proceeds of
6 some form of unlawful activity, and knowing that the transactions were
7 designed, in whole or part, to conceal and disguise the nature,
8 location, source, ownership and control of the proceeds of such
9 specified unlawful activity, and to avoid a transaction reporting
10 requirement under State or Federal law, in violation of Title 18,
11 United States Code, Sections 1956 (a)(1)(B)(i) and (ii).
12 All in violation of Title 18, United States Code, Section 1956(h).

13 Count 4

14 (Failure to Maintain a Reasonably Designed
15 Anti-Money Laundering Program)

16 From in or about 2012, and continuing until in or about
17 November 18, 2015, within the Southern District of California and
18 elsewhere, the defendants HARVEY SOUZA and VC CARDROOM, Inc.,
19 dba "Seven Mile Casino," fka "Village Card Club," together with
20 others, did willfully violate the Bank Secrecy Act ("BSA"), Title 31,
21 United States Code, Sections 5318(h) and 5322, and regulations issued
22 thereunder, specifically, Title 31, Code of Federal Regulations,
23 Section 1021.210(a) (formerly 103.120(d)), by failing to develop,
24 implement and maintain an anti-money laundering program reasonably
25 designed to comply with Title 31, Chapter 53, Subchapter II, and
26 regulations issued thereunder, at VC CARDROOM, Inc., dba "Seven Mile
27 Casino," fka "Village Card Club," a domestic financial institution
28 pursuant to Title 31, United States Code, Section 5312(a)(2)(X).

Specifically, the defendants HARVEY SOUZA and VC CARDROOM, Inc., dba "Seven Mile Casino," fka "Village Card Club," knowingly and willfully failed to implement and maintain reasonably designed policies, procedures and internal controls for: (1) verifying customer identification, in particular as to those customers who received in excess of \$10,000 in currency in a single day as required by the BSA; (2) filing accurate and truthful Currency Transaction Reports ("CTRs") for currency transactions in excess of \$10,000, conducted by or on behalf of the same person or entity on the same day; (3) assuring that CTRs were properly filed; and (4) providing adequate education and/or training of appropriate personnel concerning their responsibilities under the anti-money laundering program.

All in violation of Title 31, United States Code, Sections 5318(h)(1) and 5322(a); Title 31, Code of Federal Regulations, Section 1021.210(a); and Title 18, United States Code, Section 2.

Count 5

(Failure to Maintain a Reasonably Designed
Anti-Money Laundering Program)

From in or about 2012, and continuing until in or about November 18, 2015, within the Southern District of California and elsewhere, the defendants NASEEM SALEM, aka "Nick," and PALOMAR CARD CLUB, together with others, did willfully violate the Bank Secrecy Act, Title 31, United States Code, Sections 5318(h) and 5322, and regulations issued thereunder, specifically, Title 31, Code of Federal Regulations, Section 1021.210(a) (formerly 103.120(d)), by failing to develop, implement and maintain an anti-money laundering program reasonably designed to comply with Title 31, Chapter 53, Subchapter II, and regulations issued thereunder, at PALOMAR CARD

1 CLUB, a domestic financial institution pursuant to Title 31, United
2 States Code, Section 5312(a)(2)(X).

3 Specifically, the defendants NASEEM SALEM, aka "Nick," and
4 PALOMAR CARD CLUB, knowingly and willfully failed to implement and
5 maintain reasonably designed policies, procedures and internal
6 controls for: (1) verifying customer identification, in particular as
7 to those customers who received in excess of \$10,000 in currency in a
8 single day as required by the BSA; (2) filing accurate and truthful
9 CTRs for currency transactions in excess of \$10,000, conducted by or
10 on behalf of the same person or entity on the same day; (3) assuring
11 that CTRs were properly filed; and (4) providing adequate education
12 and/or training of appropriate personnel concerning their
13 responsibilities under the anti-money laundering program.

14 All in violation of Title 31, United States Code, Sections 5318(h)(1)
15 and 5322(a); Title 31, Code of Federal Regulations,
16 Section 1021.210(a); and Title 18, United States Code, Section 2.

17 Count 6

18 (Transporting Individual to Engage in Prostitution)

19 On or about August 22, 2014, defendants DAVID STROJ, aka "Fat
20 Dave," and JEFFREY BROADT, within the Southern District of California
21 and elsewhere, knowingly transported I.B-M, in interstate and foreign
22 commerce, from Mexico to California and Nevada, with intent that I.B-M
23 engage in prostitution and sexual activity for which a person can be
24 charged with a criminal offense, and aided and abetted such conduct;
25 in violation of Title 18, United States Code, Sections 2421 and 2.

26 //

27 //

28 //

Count 7

(Transporting Individual to Engage in Prostitution)

On or about October 30, 2014, defendants DAVID STROJ, aka "Fat Dave," and JEFFREY BROADT, within the Southern District of California and elsewhere, knowingly transported M.R. in interstate and foreign commerce, from Mexico to California, with intent that M.R. engage in prostitution and sexual activity for which a person can be charged with a criminal offense, and aided and abetted such conduct; in violation of Title 18, United States Code, Sections 2421 and 2.

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 1 through 3, and Counts 6 and 7 are realleged and by their reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(A), 981(a)(1)(C), 982(a)(1), 1955(d), and 2428(b), and Title 28, United States Code, Section 2461(c).

2. As a result of the commission of the offenses alleged in Counts 1 and 2 of this indictment, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d), and Title 28, United States Code, Section 2461(c), defendants DAVID STROJ, aka "Fat Dave," MATTHEW GREENWOOD, JEFFREY BROADT, JEFFREY STOFF, ARTURO DIAZ-RAMIREZ, JAIME BEHAR, ROBERT STROJ, CRAIG KOLK, JEAN PAUL ROJO, JOSHUA JONES, RICARDO CASTELLANOS-VELASQUEZ, ALEXANDRA KANE, BRYAN SIBBACH, JOSEPH PALERMO, THOMAS MALLOZZI, aka "Tommy Ty," STEPHEN BEDNAR, aka "Stevie T," CHRISTOPHER PARSONS, JEFFREY MOHR, KYLE ALLEN, MICHAEL HIPPLE, DUY TRANG, ALFREDO BARBA, shall, upon conviction, forfeit to the United States all their rights, title and interest in any and all property, real and personal, constituting, or derived from, any proceeds

1 traceable to the violations, and any and all property, including
2 money, used in the commission of the violations alleged in Counts 1
3 and 2 of this indictment. The property to be forfeited includes, but
4 is not limited to:

5 a. Wells Fargo Bank account number 1951697901 in the name
6 David Stroj, which was opened by defendant DAVID STROJ;

7 b. Bank of America account number 001053902131 in the name
8 Jeffrey Stoff and Carolyn Stevens, which was opened by defendant
9 JEFFREY STOFF;

10 c. Wells Fargo Bank account number 9246313820 in the name
11 Craig Kolk and Marcela Badin, which was opened by defendant CRAIG
12 KOLK;

13 d. Bank of America account number 001647042977 in the name
14 Craig Kolk, which was opened by defendant CRAIG KOLK;

15 e. Wells Fargo Bank account number 5969471134 in the name
16 Maxica Financial dba Jacques Rojo, which defendant JEAN PAUL ROJO is a
17 beneficial owner;

18 f. Bank of America account number 325041976153 in the name
19 Robert Stroj, which was opened by defendant ROBERT STROJ;

20 g. Wells Fargo account number 5207497164 in the name
21 Robert Stroj and Jaime Stroj, which was opened by defendant ROBERT
22 STROJ;

23 h. U.S. Bank account number 196470730132 in the name of
24 Matthew P. Greenwood, which was opened by defendant MATTHEW GREENWOOD;

25 i. Bank of America account number 325038032961 in the name
26 of Arturo U. Diaz, which was opened by defendant ARTURO DIAZ;

1 j. Bank of America account number 1789666466 held in the
2 name of Michael F. Hipple, which was opened by defendant MICHAEL
3 HIPPLE;

4 k. Wells Fargo Bank account number 6358884432 held in the
5 name of Berenice G. Lopez Melesio aka Gabriela Stroj, which defendant
6 DAVID STROJ is a beneficial owner;

7 l. Palomar Card Club Player's Bank account held at
8 Neighborhood National Bank account number 0400007183, and held in the
9 name of Nasem "Nick" Salem, Donald Staats and Susan Staats;

10 m. Palomar Card Club Business Marker Bank account held at
11 Neighborhood National Bank account number 0400002739 and held in the
12 name of Naseem "Nick" Salem Donald Staats and Susan Staats;

13 n. MATTHEW GREENWOOD's Player Bank account number P00044
14 held at Palomar Card Club;

15 o. MATTHEW GREENWOOD's Player Bank account number
16 P000010611 held at Village Club;

17 p. JEFFREY STOFF's Player Bank account number P00136 held
18 at Palomar Card Club;

19 q. ARTURO DIAZ's Player Bank account number P000009841
20 held at Village Club;

21 r. ARTURO DIAZ's Player Bank account number P00028 held at
22 Palomar Card Club;

23 s. DAVID STROJ's Player Bank account number P00108 held at
24 Palomar Card Club;

25 t. DAVID STROJ's Player Bank account number P000010416
26 held at Village Club;

27 u. NASEEM SALEM's Player Bank account number P00098 held
28 at Palomar Card Club;

1 v. \$60,308.64 that was seized on October 29, 2014 from
2 Wells Fargo Bank account number 1951697901 belonging to DAVID STROJ;

3 w. \$61,501.00 that was seized on October 29, 2014 from a
4 safe located at DAVID STROJ's residence;

5 x. a 2008 Dodge Viper, VIN 1B3JZ65Z58V201042, registered
6 to David Stroj that was seized on October 29, 2014 from DAVID STROJ;

7 y. \$4,776.00 that was seized on October 29, 2014 from
8 MATTHEW GREENWOOD at his residence, located at 6408 La Jolla Scenic
9 Drive, La Jolla, California, CA 92037;

10 z. \$8,555.00 that was seized on October 29, 2014 from
11 JOSHUA JONES at MATTHEW GREENWOOD'S residence;

12 aa. a 2008 Chrysler 300 LX, VIN: 2C3KA43R88H298316, CA
13 LP#6FBY827, currently registered to: Robert Stroj, 4 Pomegranate
14 Street, Ladera Ranch, CA 92694, which was purchased by defendant
15 ROBERT STROJ in or about 2012;

16 bb. a 2008 Land Rover, VIN: SALME154X8A293652, CA
17 LP#6PIP655, currently registered to: Alexandra Kane, 811 S. Bedford
18 St., Apt 205, Los Angeles, CA; which was purchased by defendant
19 ALEXANDRA KANE in or about 2011;

20 cc. the real property located at 4 Pomegranate Street,
21 Ladera Ranch, CA 92694. Legal description: Lot 20 of Tract No. 16117,
22 as shown on a Subdivision Map filed on December 26, 2001, in Book 826,
23 at Pages 1 to 3, inclusive, of Miscellaneous Maps, in the Office of
24 the Orange County Recorder (APN: 741-091-21);

25 dd. the real property located at 801 North Valley View
26 Drive, Chula Vista, CA 91914. Legal description: Lot 10 of Chula
27 Vista Tract No. 92-02 Salt Creek Ranch Neighborhood 6 Unit No. 9, in
28 the City of Chula Vista, County of San Diego, State of California,

1 according to Map thereof no. 13697, filed in the office of the County
2 Recorder of San Diego County on December 3, 1998 (APN: 595-661-62-00);

3 ee. the real property located at 145 Penn Forrest Drive,
4 Albrightsville, PA 18210. Legal description: The land hereinafter
5 referred to is situated in the City of Albrightsville, County of
6 Carbon, State of PA, and is described as follows: All that certain
7 piece, parcel and tract of land situated in the Township of Penn
8 Forest, County of Carbon, and Commonwealth of Pennsylvania, and
9 described as Lot 2012 in Section IV, Towamensing Trails, on a
10 Subdivision Plan recorded in the Recorder of Deeds Office in and for
11 Carbon County, Pennsylvania on October 17, 1974 in Map Book Volume 1,
12 Page 233 (APN: 22A-51-D2012);

13 ff. the real property located at 160 N. 7th Street,
14 Lehighton, PA 18235. Legal description: The land hereinafter
15 referred to is situated in the City of Lehighton, County of Carbon,
16 State of PA, and is described as follows: All those certain four (4)
17 contiguous lots or pieces of land situate in the Borough of Lehighton,
18 Carbon County, Pennsylvania. Being situate on the West side of Seventh
19 Street and numbered in the plan or plot of Lehighton improvement
20 Company made by Wesley Boyer, C.B., as Lot Nos. 121, 122, 123, and
21 124. Being bounded and described as follows: Beginning (and describing
22 all of the said Lots as a Unit) at a point in the property line of
23 Seventh Street distant two hundred seventy-eight (278) feet from the
24 center line of Cypress Street. Thence, from said point and extending
25 Southwardly a distance of Eighty (80) feet along Seventh Street,
26 aforesaid, to a point; thence, extending Westwardly in length or depth
27 of that same width, between parallel lines at right angles to the said
28 Seventh Street, a distance of one hundred eighty-nine and seventy-five

1 one-hundredths (189.75) feet to an alley. Containing 15,180 square
2 feet of land, altogether. Bounded on the North by Lot No. 120; on the
3 East by Seventh Street; on the South by Lot No. 125 and on the West by
4 said alley (APN: 84A5-29-F4).

5 3. If any of the above-described forfeitable property, as a
6 result of any act or omission of the defendants -

7 (a) cannot be located upon the exercise of due
8 diligence;

9 (b) has been transferred or sold to, or deposited
10 with, a third party;

11 (c) has been placed beyond the jurisdiction of the Court;

12 (d) has been substantially diminished in value; or

13 (e) has been commingled with other property which cannot be
14 subdivided without difficulty;

15 it is the intent of the United States, pursuant to Title 21,
16 United States Code, Section 853(p) as incorporated by Title 28, United
17 States Code, Section 2461(c), to seek forfeiture of any other property
18 of the defendants up to the value of the said property(ies) listed
19 above as being subject to forfeiture.

20 All in violation of Title 18, United States Code,
21 Sections 981(a)(1)(C), 982(a)(1), 1955(d), and 2428(b), and Title 28,
22 United States Code, Section 2461(c).

23 4. As a result of the commission of the offense alleged in
24 Count 3 of this indictment, pursuant to Title 18, United States Code,
25 Sections 982(a)(1), defendants DAVID STROJ, aka "Fat Dave," JEFFREY
26 BROADT, ROBERT STROJ, MATTHEW GREENWOOD, CRAIG KOLK, JEFFREY STOFF,
27 ALI LAREYBI, aka "Alex," JAIME BEHAR, ARTURO DIAZ-RAMIREZ, JEAN PAUL
28 ROJO, RICARDO CASTELLANOS-VELASQUEZ, ALEXANDRA KANE, BRYAN SIBBACH,

1 JOSEPH PALERMO, CHRISTOPHER PARSONS, JEFFREY MOHR, DUY TRANG, NASEEM
2 SALEM, aka "Nick," and PALOMAR CARD CLUB, shall, upon conviction,
3 forfeit to the United States all their rights, title and interest in
4 any and all property, real and personal, involved in such offense and
5 any property traceable to such property. The property to be forfeited
6 includes, but is not limited to:

7 a. Wells Fargo Bank account number 1951697901 in the name
8 David Stroj, which was opened by defendant DAVID STROJ;

9 b. Bank of America account number 001053902131 in the name
10 Jeffrey Stoff and Carolyn Stevens, which was opened by defendant
11 JEFFREY STOFF;

12 c. Wells Fargo Bank account number 9246313820 in the name
13 Craig Kolk and Marcela Badin, which was opened by defendant CRAIG
14 KOLK;

15 d. Bank of America account number 001647042977 in the name
16 Craig Kolk, which was opened by defendant CRAIG KOLK;

17 e. Wells Fargo Bank account number 5969471134 in the name
18 Maxica Financial dba Jacques Rojo, which defendant JEAN PAUL ROJO is a
19 beneficial owner;

20 f. Bank of America account number 325041976153 in the name
21 Robert Stroj, which was opened by defendant ROBERT STROJ;

22 g. Wells Fargo account number 5207497164 in the name
23 Robert Stroj and Jamie Stroj, which was opened by defendant ROBERT
24 STROJ;

25 h. U.S. Bank account number 196470730132 in the name of
26 Matthew P. Greenwood, which was opened by defendant MATTHEW GREENWOOD;

27 i. Bank of America account number 325038032961 in the name
28 of Arturo U. Diaz, which was opened by defendant ARTURO DIAZ;

1 j. Wells Fargo Bank account number 6358884432 held in the
2 name of Berenice G. Lopez Melesio aka Gabriela Stroj, which defendant
3 DAVID STROJ is a beneficial owner;

4 k. Palomar Card Club Player's Bank account held at
5 Neighborhood National Bank account number 0400007183 and held in the
6 name of Naseem "Nick" Salem, Donald Staats and Susan Staats;

7 l. Palomar Card Club Business Marker Bank account held at
8 Neighborhood National Bank account number 0400002739 and held in the
9 name of Naseem "Nick" Salem, Donald Staats and Susan Staats;

10 m. MATTHEW GREENWOOD's Player Bank account number P00044
11 held at Palomar Card Club;

12 n. MATTHEW GREENWOOD's Player Bank account number
13 P000010611 held at Village Club;

14 o. JEFFREY STOFF's Player Bank account number P00136 held
15 at Palomar Card Club;

16 p. ARTURO DIAZ's Player Bank account number P000009841
17 held at Village Club;

18 q. ARTURO DIAZ's Player Bank account number P00028 held at
19 Palomar Card Club;

20 r. DAVID STROJ's Player Bank account number P00108 held at
21 Palomar Card Club;

22 s. DAVID STROJ's Player Bank account number P000010416
23 held at Village Club;

24 t. NASEEM SALEM's Player Bank account number P00098 held
25 at Palomar Card Club;

26 u. \$60,308.64 that was seized on October 29, 2014 from
27 Wells Fargo Bank account number 1951697901 belonging to DAVID STROJ;
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1 v. \$61,501.00 that was seized on October 29, 2014 from a
2 safe located at DAVID STROJ's residence;

3 w. a 2008 Dodge Viper, VIN 1B3JZ65Z58V201042, registered
4 to David Stroj that was seized on October 29, 2014 from DAVID STROJ;

5 x. \$4,776.00 that was seized on October 29, 2014 from
6 MATTHEW GREENWOOD at his residence, located at 6408 La Jolla Scenic
7 Drive, La Jolla, California, CA 92037;

8 y. a 2008 Chrysler 300 LX, VIN: 2C3KA43R88H298316, CA
9 LP#6FBY827, currently registered to: Robert Stroj, 4 Pomegranate
10 Street, Ladera Ranch, CA 92694, which was purchased by defendant
11 ROBERT STROJ in or about 2012; and

12 z. a 2008 Land Rover, VIN: SALME154X8A293652, CA
13 LP#6PIP655, currently registered to: Alexandra Kane, 811 S. Bedford
14 St., Apt. 205, Los Angeles, CA; which was purchased by defendant
15 ALEXANDRA KANE in or about 2011;

16 aa. the real property located at 4 Pomegranate Street,
17 Ladera Ranch, CA 92694. Legal description: Lot 20 of Tract No. 16117,
18 as shown on a Subdivision Map filed on December 26, 2001, in Book 826,
19 at Pages 1 to 3, inclusive, of Miscellaneous Maps, in the Office of
20 the Orange County Recorder (APN: 741-091-21);

21 bb. the real property located at 801 North Valley View
22 Drive, Chula Vista, CA 91914. Legal description: Lot 10 of Chula
23 Vista Tract No. 92-02 Salt Creek Ranch Neighborhood 6 Unit No. 9, in
24 the City of Chula Vista, County of San Diego, State of California,
25 according to Map thereof no. 13697, filed in the office of the County
26 Recorder of San Diego County on December 3, 1998 (APN: 595-661-62-00);

27 cc. the real property located at 145 Penn Forrest Drive,
28 Albrightsville, PA 18210. Legal description: The land hereinafter

1 referred to is situated in the City of Albrightsville, County of
2 Carbon, State of PA, and is described as follows: All that certain
3 piece, parcel and tract of land situated in the Township of Penn
4 Forest, County of Carbon, and Commonwealth of Pennsylvania, and
5 described as Lot 2012 in Section IV, Towamensing Trails, on a
6 Subdivision Plan recorded in the Recorder of Deeds Office in and for
7 Carbon County, Pennsylvania on October 17, 1974 in Map Book Volume 1,
8 Page 233 (APN: 22A-51-D2012); and

9 dd. the real property located at 160 N. 7th Street,
10 Lehighton, PA 18235. Legal description: The land hereinafter
11 referred to is situated in the City of Lehighton, County of Carbon,
12 State of PA, and is described as follows: All those certain four (4)
13 contiguous lots or pieces of land situate in the Borough of Lehighton,
14 Carbon County, Pennsylvania. Being situate on the West side of Seventh
15 Street and numbered in the plan or plot of Lehighton improvement
16 Company made by Wesley Boyer, C.B., as Lot Nos. 121, 122, 123, and
17 124. Being bounded and described as follows: Beginning (and describing
18 all of the said Lots as a Unit) at a point in the property line of
19 Seventh Street distant two hundred seventy-eight (278) feet from the
20 center line of Cypress Street. Thence, from said point and extending
21 Southwardly a distance of Eighty (80) feet along Seventh Street,
22 aforesaid, to a point; thence, extending Westwardly in length or depth
23 of that same width, between parallel lines at right angles to the said
24 Seventh Street, a distance of one hundred eighty-nine and seventy-five
25 one-hundredths (189.75) feet to an alley. Containing 15,180 square
26 feet of land, altogether. Bounded on the North by Lot No. 120; on the
27 East by Seventh Street; on the South by Lot No. 125 and on the West by
28 said alley (APN: 84A5-29-F4).

1 5. If any of the above-described forfeitable property, as a
2 result of any act or omission of the defendants -

3 (a) cannot be located upon the exercise of due
4 diligence;

5 (b) has been transferred or sold to, or deposited
6 with, a third party;

7 (c) has been placed beyond the jurisdiction of the Court;

8 (d) has been substantially diminished in value; or

9 (e) has been commingled with other property which cannot be
10 subdivided without difficulty;

11 it is the intent of the United States, pursuant to Title 21,
12 United States Code, Section 853(p) as incorporated by Title 18, United
13 States Code, Section 982(b), to seek forfeiture of any other property
14 of the defendant up to the value of the said property(ies) listed
15 above as being subject to forfeiture.

16 6. As a result of the commission of the offense alleged in
17 Counts 6 and 7 of this indictment, pursuant to Title 18, United States
18 Code, Section 2428, defendants DAVID STROJ, aka "Fat Dave," and
19 JEFFREY BROADT shall forfeit to the United States any property, real
20 and personal, used or intended to be used to commit or to facilitate
21 the commission of the violation, and any property, real and personal,
22 constituting or derived from proceeds obtained, directly and
23 indirectly, as result of the violation.

24 7. If any of the above-described forfeitable property, as a
25 result of any act or omission of the defendants -

26 (a) cannot be located upon the exercise of due
27 diligence;

- 1 (b) has been transferred or sold to, or deposited
2 with, a third party;
3 (c) has been placed beyond the jurisdiction of the Court;
4 (d) has been substantially diminished in value; or
5 (e) has been commingled with other property which cannot be
6 subdivided without difficulty;

7 it is the intent of the United States, pursuant to Title 21,
8 United States Code, Section 853(p) as incorporated by Title 18, United
9 States Code, Section 2428(b), to seek forfeiture of any other property
10 of the defendants up to the value of the said property(ies) listed
11 above as being subject to forfeiture.

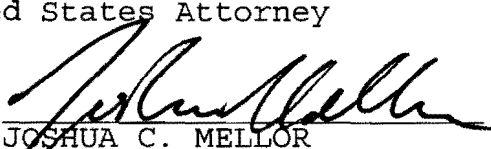
12 All Pursuant to Title 18, United States Code, Sections 981(a)(1)(A),
13 981(a)(1)(C), 982(a)(1), 1955(d), 2428(b), and Title 28, United States
14 Code, Section 2461(c).

15 DATED: November 19, 2015.

16 A TRUE BILL:

17 
18 _____
Foreperson

19 LAURA E. DUFFY
United States Attorney

20
21 By: 
22 JOSHUA C. MELLOR
Assistant U.S. Attorney